



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T2-020024

**FACILITY ID No.:** 075-00001

**AQCR:** 63

**CLASS:** A

**SIC:** 2431

**ZONE:** 11

**UTM COORDINATE (km):** 506.8, 4883.9

**1. PERMITTEE**

Woodgrain Millwork, Inc.

**2. PROJECT**

Tier II Operating Permit and Permit to Construct Required by Tier I Operating Permit No. 075-00001, issued December 11, 2002

**3. MAILING ADDRESS**

P.O. Box 566

**CITY**

Fruitland

**STATE**

ID

**ZIP**

83619

**4. FACILITY CONTACT**

Stephen Coe

**TITLE**

Corporate Environmental Manager

**TELEPHONE**

(208) 452-8264

**5. RESPONSIBLE OFFICIAL**

David Lindsey

**TITLE**

Vice President

**TELEPHONE**

(208) 452-8316

**6. EXACT PLANT LOCATION**

Northeast ¼, Section 22, T8N, R5W, Boise-Meridian

**COUNTY**

Payette

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Prefinished moldings and millwork

**8. PERMIT AUTHORITY**

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

\_\_\_\_\_  
TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:**

**PUBLIC COMMENT**

**DATE MODIFIED/REVISED**

**DATE EXPIRES:**

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## Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
µg/m <sup>3</sup>	micropounds per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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**1. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT SCOPE*****Purpose***

- 1.1 This Tier II operating permit and permit to construct is required by Tier I Operating Permit No. 075-00001, issued December 11, 2002.
- 1.2 This Tier II operating permit and permit to construct incorporates and replaces the following permits, the terms and conditions of which shall no longer apply:
- PTC No. 075-00001 issued June 19, 2002

***Regulated Sources***

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
3	Millwork Cyclone B	None
3	Millwork Cyclone C	None
3	Millwork Cyclone I	None
3	Millwork Baghouse G	None
3	Millwork Baghouse E	None
3	System 3, 4, & 5 Cyclone J	None
3	System 3, 4, & 5 Cyclone K	None
3	System 3, 4, & 5 Baghouse L	None
3	System 3, 4, & 5/Millwork/Optimizing Baghouse M	None
3	Millwork Cyclone D	None
3	Decramold Cyclone H	None
3	Storage Shed, Lumber	None

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**2. FACILITY-WIDE CONDITIONS*****Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

***Odors***

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

**Visible Emissions**

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

**Excess Emissions**

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**Open Burning**

- 2.10 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

**Performance Testing**

- 2.11 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine

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that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

***Monitoring and Recordkeeping***

- 2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

***Reports and Certifications***

- 2.13 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Department of Environmental Quality  
Boise Regional Office  
Air Quality Permit Compliance  
1445 N. Orchard  
Boise Idaho 83706  
Phone: (208) 373-0550  
Fax: (208) 373-0287

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***Fuel-burning Equipment***

- 2.14 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid.

***Sulfur Content***

- 2.15 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
  - ASTM Grade 2 fuel oil - 0.5% by weight.
  - ASTM Grades 4, 5 and 6 fuel oil – 1.75% by weight.
- 2.16 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis. The verification records shall be maintained in accordance with Permit Condition 2.12.



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### 3. WOOD PROCESSING AND HANDLING

#### 3.1 Process Description

This emission unit consists of the wood processing and handling operations for the following manufacturing areas at the Fruitland facility: Prefinish (Coatings, Wrap) and Millwork (Optimization, Decramold, Animal Bedding Bailing, Woodtreat, and Storage). Wood processing consists of cutting, moulding, shaping, and joining of wood. Wood processing also consists of wood treatment for fungicide, base coat application, painting, lamination, and hammer hog processing of scrap materials. Wood handling also consists of the transfer of sawdust and shavings by pneumatic conveyance and drop transfers for the following process areas: Prefinish and Millwork. Wood processing consists of cutting, joining of wood, moulding, and shaping.

**Table 3.1 Wood Processing and Handling Equipment Description**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Millwork Cyclone B	Uncontrolled	Cyclone B Stack
Millwork Cyclone C	Uncontrolled	Cyclone C Stack
Millwork Cyclone I	Uncontrolled	Cyclone I Stack
Millwork Baghouse G	Uncontrolled	Baghouse G Stack
Millwork Baghouse E	Uncontrolled	Baghouse E Stack
System 3, 4, & 5 Cyclone J	Uncontrolled	Cyclone J Stack
System 3, 4, & 5 Cyclone K	Uncontrolled	Cyclone K Stack
System 3, 4, & 5 Baghouse L	Uncontrolled	Baghouse L Stack
System 3, 4, & 5/Millwork/Optimizing Baghouse M	Uncontrolled	Baghouse M Stack
Millwork Cyclone D	Uncontrolled	Cyclone D Stack
Storage Shed, Lumber & Decramold Cyclone H	Uncontrolled	Cyclone H Stack

#### ***Emissions Limits***

#### 3.2 Visible Emissions

The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

#### ***Operating Requirements***

#### 3.3 General Compliance Requirements

At all times when operating the Prefinish and Millwork processes, the permittee shall operate the wood processing and handling equipment listed in Table 3.1 of Permit Condition 3.1.

[PTC Condition]

#### ***Monitoring and Recordkeeping Requirements***

#### 3.4 Visible Emissions

The permittee shall monitor and record visible emissions in accordance with Permit Condition 2.8 to demonstrate compliance with Permit Conditions 2.7 and 3.2.

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**4. COATING AND GLUING****4.1 Process Description**

This process consists of coating and gluing operations for the following manufacturing areas at the Fruitland facility: Prefinish and Millwork - Woodtreat. Coating and gluing consists of roll coating, fan coating, curtain coating, gluing, and wood treatment operations at the facility.

**4.2 Emission Control Description**

VOC emissions are uncontrolled. HAP emissions are controlled by limiting the HAP content of coatings, thinners, and cleaning materials used in the coating and gluing operation.

***Emissions Limits*****4.3 HAP Emissions Limits**

- Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.
- Facility-wide acetaldehyde emissions shall be less than 0.148 lbs/hr.
- Facility-wide formaldehyde emissions shall be less than 0.048 lbs/hr.

[PTC Condition]

**4.4 VOC Emission Limits**

Facility-wide VOC emissions shall not exceed 813.6 tons per year.

[PTC Condition]

***Operating Requirements*****4.5 HAP Emissions Limit [40 CFR 63.4690 & Table 2]**

**The permittee shall demonstrate compliance with one of the following HAP emissions limits:**

- The organic HAP emissions limit for coatings applied to doors, windows, and miscellaneous products shall not exceed 1.93 lb HAP/gallon solids. The permittee shall demonstrate compliance with this permit condition using the emission rate without add-on controls option in Permit Conditions 4.17 through 4.22.
- The permittee shall use no coating for which the organic HAP content determined using Equation 2 of Permit Condition 4.13 exceeds 1.93 lb HAP/gallon solids and use no thinner or cleaning material that contains organic HAP, determined according to Permit Condition 4.12. The permittee shall demonstrate compliance with this permit condition using the compliant materials option in Permit Conditions 4.12 through 4.15.

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#### 4.6 Material Purchase Records

- The permittee shall maintain the purchase records of all manufacturing-related materials that contain HAPs including, but not limited to, adhesives, caulks, solvents, and paints.
- The permittee shall maintain the purchase records of all manufacturing-related materials that contain VOCs including, but not limited to, adhesives, caulks, solvents, and paints.

[PTC Condition]

#### 4.7 Material Safety Data Sheets

- The permittee shall maintain the MSDS' for the manufacturing-related materials that contain HAPs purchased pursuant to Permit Condition 4.6. The MSDS' shall remain on site at all times and shall be made available to DEQ representatives upon request.
- The permittee shall maintain the MSDS' for the manufacturing-related materials that contain VOCs purchased pursuant to Permit Condition 4.6. The MSDS' shall remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC Condition]

#### 4.8 General Compliance Requirements

At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, as required by 40 CFR 63.6(e)(1)(i), such that the permittee complies with 40 CFR 63, Subpart QQQQ.

[PTC Condition]

### ***Monitoring Requirements***

#### 4.9 Material Usage Records

- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains HAPs. The usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.
- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains VOCs. The usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

[PTC Condition]

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#### 4.10 VOC Monitoring Requirements

The permittee shall monitor and record the monthly and annual VOC emissions from the process using the purchase records required by Permit Condition 4.6, the MSDS' required by Permit Condition 4.7, and the material usage records required by Permit Condition 4.9 to demonstrate compliance with Permit Condition 4.4. Annual VOC emissions shall be determined by summing monthly VOC emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

[PTC Condition]

#### 4.11 HAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from the process using the purchase records required by Permit Condition 4.6, the MSDS' required by Permit Condition 4.7, and the material usage records required by Permit Condition 4.9 to demonstrate compliance with Permit Condition 4.3. Annual HAP emissions shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

[PTC Condition]

### ***Compliant Material Option For Demonstration of Compliance with Permit Condition 4.5***

4.12 The permittee shall determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each month by using one of the following options:

4.12.1 Method 311 (appendix A to 40 CFR 63). The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in a & b below when performing a Method 311 test.

- a. Count each organic HAP that is measured to be present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0% by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5% of the material by mass, the permittee does not have to count it. Express the mass fraction of each organic HAP counted as a value truncated to four places after the decimal point (e.g., 0.379178412 truncates to 0.3791).
- b. Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g. 0.379).

4.12.2 Method 24 (appendix A to 40 CFR 60). For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. (Note: Method 24 is not appropriate for those coatings with a water content that would result in an effective detection limit greater than the applicable emission limit.)

4.12.3 The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Director has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.

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- 4.12.4 The permittee may rely on information other than that generated by the test methods specified above in Permit Conditions 4.12.1, 4.12.2, and 4.12.3, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0% by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is 0.5% of the material by mass, the permittee does not have to count it. If there is a disagreement between such information and results of a test conducted as specified above in Permit Conditions 4.12.1, 4.12.2, and 4.12.3, then the test method results will take precedence unless, after consultation with DEQ, a regulated source could demonstrate to the satisfaction of DEQ that the formulation data were correct.
- 4.12.5 Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 4.1 or Table 4.2 of Permit Conditions 4.12.5 and 4.12.6, respectively. If the permittee uses the tables, the permittee shall use the values in Table 4.1 for all solvent blends that match Table 4.1 entries, and the permittee may only use Table 4.2 if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 4.1, and the permittee only knows whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (40 CFR 63, appendix A) test indicate higher values than those listed on Tables 4.1 and 4.2, the Method 311 results will take precedence. The permittee may use the mass fraction values in the following table for solvent blends for which the permittee does not have test data or manufacturer's formulation data.

**Table 4.1 DEFAULT ORGANIC HAP MASS FRACTION FOR SOLVENTS AND SOLVENT BLENDS**

<b>Solvent/solvent blend</b>	<b>CAS. No.</b>	<b>Average organic HAP mass fraction</b>	<b>Typical organic HAP, percent by mass</b>
1. Toluene	108-88-3	10	Toluene
2. Xylene(s)	1330-20-7	1.0	Xylenes, ethylbenzene
3. Hexane.	110-54-3	.05	n-hexane
4. n-Hexane	110-54-3	1.0	n-hexane
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene
6. Aliphatic 140		0	None.
7. Aromatic 100		0.02	1% xylene, 1% cumene.
8. Aromatic 150		0.09	Naphthalene.
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene
10. Aromatic solvent	64742-94-5	0.1	Naphthalene
11. Exempt mineral spirits	8032-32-4	0	None
12. Ligroines (VM & P)	8032-32-4	0	None
13. Lactol spirits	64742-89-6	0.15	Toluene
14. Low aromatic white spirit	64742-82-1	0	None
15. Mineral spirits	64742-88-7	0.01	Xylenes
16. Hydrotreated naphtha	64742-48-9	0	None
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene
18. Stoddard solvent	8052-41-3	0.01	Xylenes
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes
20. Varsol ® solvent	8052-49-3	0.05	0.5% xylenes, 0.5% ethylbenzene
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene
22. Petroleum distillate mixture.	68477-31-6	0.08	4% naphthalene, 4% biphenyl

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- 4.12.6 The permittee may use the mass fraction values in the following table for solvent blends for which the permittee does not have test data or manufacturer's formulation data.

**Table 4.2 DEFAULT ORGANIC HAP MASS FRACTION FOR PETROLEUM SOLVENT GROUPS<sup>A</sup>**

Solvent type	Average Organic HAP Mass Fraction	Typical organic HAP, percent by mass
Aliphatic <sup>b</sup>	0.03	1% xylene, 1% toluene, and 1% ethylbenzene.
Aromatic <sup>c</sup>	0.06	4% xylene, 1% toluene, and 1% ethylbenzene.

<sup>a</sup> Use this table only if the solvent blend does not match any of the solvent blends in Table 4.1 and the permittee only knows whether the blend is aliphatic or aromatic.

<sup>b</sup> E.g., Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

<sup>c</sup> E.g., Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

- 4.13 The permittee shall determine the volume fraction of coating solids for each coating used during each month according to the requirements in Permit Conditions 4.13.1, 4.13.2, or 4.13.3 as follows.
- 4.13.1 ASTM Method D2697–86 (Reapproved ASTM 1998) or D6093–97. The permittee may use ASTM Method D2697–86 (Reapproved 1998), “Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings” (incorporated by reference, see §63.14), or D6093–97, “Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer” (incorporated by reference, see 40 CFR 63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. If these values cannot be determined using these methods, the permittee may submit an alternative technique for determining their values for approval by the Director.
- 4.13.2 Information from the supplier or manufacturer of the material. The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.
- 4.13.3 Calculation of volume fraction of coating solids. If the volume fraction of coating solids cannot be determined using the options in Permit Condition 4.13.1 or 4.13.2, the permittee shall determine volume fraction of coating solids using the following equation:

$$V_s = 1 - \left( \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \right) \quad (\text{Eq. 1})$$

Where:

$V_s$  = Volume fraction of coating solids, gallons coating solids per liter coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, pounds volatile matter per liter coating.

$D_{\text{avg}}$  = Average density of volatile matter in the coating, pounds volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

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- 4.14 The permittee shall calculate the organic HAP content, pounds organic HAP per liter coating solids, of each coating used during the compliance period, using the following equation:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where:

- $H_c$  = Organic HAP content of the coating, pounds organic HAP per liter coating solids  
 $D_c$  = Density of coating, pounds coating per liter coating, determined according to paragraph (c) of his section  
 $W_c$  = Mass fraction of organic HAP in the coating, pounds organic HAP per gram coating, determined according to Permit Condition 4.12  
 $V_s$  = Volume fraction of coating solids, liter coating solids per liter coating, determined according to Permit Condition 4.13.

- 4.15 The permittee shall determine the density of each coating, thinner and cleaning material used during each month from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and the supplier’s or manufacturer’s information sources, the test results will take precedence.
- 4.16 The organic HAP content for each coating used during the initial compliance period, determined using Equation 2 of Permit Condition 4.14, must be less than or equal to the applicable emission limit in Permit Condition 4.5 ; and each thinner and cleaning material used during the initial compliance period must contain no organic HAP, determined according to Permit Condition 4.24. The permittee must keep all records required by Permit Conditions 4.23 through 4.31, and Permit Condition 2.12. As part of the Notification of Compliance Status required in Permit Condition 4.34, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in, Permit Condition 4.5 and you used no thinners or cleaning materials that contained organic HAP, determined according to Permit Condition 4.12 of this Permit Section.

***Emission Rate Without Add-On Controls Option For Demonstration of Compliance with Permit Condition 4.5***

- 4.17 The permittee shall determine the volume (gallons) of each coating, thinner, and cleaning material used during each month by measurement or usage records.
- 4.18 The permittee shall calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners, and cleaning materials used during each month minus the organic HAP in certain waste materials. The permittee shall calculate it using the following equation:

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$$H_e = A + B + C - R_w \quad (\text{Eq.1})$$

Where:

- $H_e$  = Total mass of organic HAP emissions during the month, pounds.  
 $A$  = Total mass of organic HAP in the coatings used during the month, pounds, as calculated in Equation 1A of this section.  
 $B$  = Total mass of organic HAP in the thinners used during the month, pounds, as calculated in Equation 1B of this section.  
 $C$  = Total mass of organic HAP in the cleaning materials used during the month, pounds, as calculated in Equation 1C of Permit Condition 4.18.3.  
 $R_w$  = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, pounds, determined according to Permit Condition 4.17. (The permittee may assign a value of zero to  $R_w$  if the permittee does not wish to use this allowance.)

- 4.18.1 The permittee shall calculate the mass of organic HAP in the coatings used during the month, using the following equation:

$$A = \sum_{i=1}^m \left( Vol_{c,i} \right) \left( D_{c,i} \right) \left( W_{c,i} \right) \quad (\text{Eq. 1A})$$

Where:

- $A$  = Total mass of organic HAP in the coatings used during the month, pounds.  
 $Vol_{c,i}$  = Total volume of coating, i, used during the month, gallons.  
 $D_{c,i}$  = Density of coating, i, pounds coating per liter coating.  
 $W_{c,i}$  = Mass fraction of organic HAP in coating, i, pounds organic HAP per gram coating.  
 $m$  = Number of different coatings used during the month.

- 4.18.2 The permittee shall calculate the mass of organic HAP in the thinners used during the month, using the following equation:

$$B = \sum_{j=1}^n \left( Vol_{t,j} \right) \left( D_{t,j} \right) \left( W_{t,j} \right) \quad (\text{Eq. 1B})$$

Where:

- $B$  = Total mass of organic HAP in the thinners used during the month, pounds.  
 $Vol_{t,j}$  = Total volume of thinner, j, used during the month, gallons.  
 $D_{t,j}$  = Density of thinner, j, pounds per liter.  
 $W_{t,j}$  = Mass fraction of organic HAP in thinner, j, pounds organic HAP per gram thinner.  
 $n$  = Number of different thinners used during the month.



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- 4.18.3 The permittee shall calculate the mass of organic HAP in the cleaning materials used during the month using the following equation:

$$C = \sum_{k=1}^p \left( \text{Vol}_{s,k} \right) \left( D_{s,k} \right) \left( W_{s,k} \right) \quad (\text{Eq. 1C})$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, pounds.

Vol<sub>s,k</sub> = Total volume of cleaning material, k, used during the month, gallons.

D<sub>s,k</sub> = Density of cleaning material, k, pounds per liter.

W<sub>s,k</sub> = Mass fraction of organic HAP in cleaning material, k, pounds organic HAP per gram material.

p = Number of different cleaning materials used during the month.

- 4.19 If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of Permit Condition 4.18, then the permittee shall determine it in accordance with the following:
- 4.19.1 The permittee shall include in the determination only waste materials that are generated by coating operations for which the permittee uses Equation 1 of Permit Condition 4.18 and that will be treated or disposed of by a facility regulated as a TSDF under 40 CFR 63.262, 264, 265, or 266. The TSDF may be either off-site or on-site. The permittee shall not include organic HAP contained in wastewater.
- 4.19.2 The permittee shall determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. The permittee shall not include in the determination any waste materials sent to a TSDF during a month if the permittee has already included them in the amount collected and stored during that month or a previous month.
- 4.19.3 The permittee shall determine the total mass of organic HAP contained in the waste materials specified in Permit Condition 4.19.2.
- 4.19.4 The permittee may use any reasonable methodology to determine the amount of waste materials and the total mass of organic HAP they contain, and the permittee shall document the methodology as required in Permit Condition 4.32. To the extent that waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.
- 4.20 The permittee shall determine the total volume of coating solids used which is the combined volume of coating solids for all the coatings used during each month, using the following equation:

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$$V_{st} = \sum_{i=1}^m \left( Vol_{c,i} \right) \left( V_{s,i} \right) \quad (\text{Eq. 2})$$

Where:

- $V_{st}$  = Total volume of coating solids used during the month, gallons.  
 $Vol_{c,i}$  = Total volume of coating, i, used during the month, gallons.  
 $V_{s,i}$  = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to Permit Condition 4.13.  
 $m$  = Number of coatings used during the month.

- 4.21 The permittee shall calculate the organic HAP emission rate for the 12-month compliance period, pounds organic HAP per liter coating solids used, using the following equation:

$$H_{yr} = \frac{\sum_{y=1}^{12} H_e}{\sum_{y=1}^{12} V_{st}} \quad (\text{Eq. 3})$$

Where:

- $H_{yr}$  = Organic HAP emission rate for the 12-month compliance period, pounds organic HAP per liter coating solids.  
 $H_e$  = Total mass of organic HAP emissions, pounds, from all materials used during month, y, as calculated by Equation 1 of this section.  
 $V_{st}$  = Total volume of coating solids used during month, y, gallons, as calculated by Equation 2 of Permit Condition 4.20.  
 $y$  = Identifier for months.

- 4.22 The organic HAP emission rate for the initial 12-month compliance period, calculated using Equation 3 of this section, shall be less than or equal to the applicable emission limit in Permit Condition 4.5. The permittee shall keep all records as required by Permit Conditions 4.21 through 4.38. As part of the Notification of Compliance Status required by Permit Conditions 4.30 through 4.38, the permittee shall identify the coating operation(s) for which it used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Permit Condition 4.5, determined according to Permit Conditions 4.12 through 4.19.
- 4.23 To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, calculated using Equation 3 of Permit Condition 4.21 must be less than or equal to the applicable emission limit in Permit Condition 4.5. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Permit Condition 4.34 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee must perform the calculations in Permit Conditions 4.12 through 4.13 and Permit Conditions 4.17 through 4.22 on a monthly basis using data from the previous 12 months of operation.

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***Recordkeeping Requirements***

- 4.24 The permittee must collect and keep a copy of each notification and report that the permittee submitted to comply with Permit Conditions 4.5 through 4.40., and the documentation supporting each notification and report. Failure to collect and keep these records, and any records required by Permit Conditions 4.24 through 4.31, is a deviation from Permit Condition 4.5.
- 4.25 The permittee must collect and keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall keep a copy of the complete test report. If the permittee uses information provided to the permittee by the manufacturer or supplier of the material that was based on testing, the permittee shall keep the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- 4.26 For each compliance period, the permittee must maintain the following records:
- 4.26.1 The permittee must collect and keep a record of the coating operations at which the permittee used each compliance option and the time periods (beginning and ending dates and times) the permittee used each option.
- 4.26.2 For the emission rate without add-on controls option, the permittee must collect and keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through 1C, and 2 of Permit Conditions 4.18, 4.18.1 through 4.18.3, and 4.20, respectively; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Permit Condition 4.19 the calculation of the total volume of coating solids used each month, using Equation 2 of Permit Condition 4.20; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of Permit Condition 4.21.
- 4.27 The permittee must collect and keep a record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.
- 4.28 The permittee must collect and keep a record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.
- 4.29 The permittee must collect and keep a record of the volume fraction of coating solids for each coating used during each compliance period.
- 4.30 The permittee must collect and keep a record of the density for each coating used during each compliance period; and, if the permittee used the emission rate without add-on controls option, the density for each thinner and cleaning material used during each compliance period.
- 4.31 If the permittee uses an allowance in Equation 1 of Permit Condition 4.18 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to Permit Condition 4.19, the permittee shall keep records of the information as follows.

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- 4.31.1 The name and address of each TSDF to which the permittee sent waste materials for which the permittee used an allowance in Equation 1 of Permit Condition 4.18; a statement of which subparts under 40 CFR 262, 264, 265, and 266 apply to the TSDF; and the date of each shipment.
- 4.31.2 Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of Permit Condition 4.13.3.
- 4.31.3 The methodology used in accordance with Permit Condition 4.19 to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This shall include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- 4.32 The permittee shall keep records of the date, time, and duration of each deviation

***Reporting Requirements***

- 4.33 The initial compliance period begins on the May 28, 2006 and ends on the last day of the 12th month following this compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The permittee must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to Permit Conditions 4.17 through 4.21 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in Permit Condition 4.5.
- 4.34 The permittee must submit the Notification of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in Permit Condition 4.33. The Notification of Compliance Status must contain the information specified below and in 40 CFR 63.9(h).
- 4.34.1 Company name and address
- 4.34.2 Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report
- 4.34.3 Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in Permit Condition 4.33
- 4.34.4 Identification of the compliance option or options specified in 40 CFR 63.4691 that you used on each coating operation in the affected source during the initial compliance period
- 4.34.5 Statement of whether or not the affected source achieved the emission limitations for the initial compliance period

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- 4.34.6 If a deviation occurred, a description and statement of the cause of the deviation
- 4.34.7 If a deviation occurred and you failed to meet the applicable emission limit in Permit Condition 4.5, include all the calculations used to determine the pounds organic HAP emitted per liter of coating solids used (pounds (lb) organic HAP emitted per gallon of coating solids used). Do not need submit information provided by the materials suppliers or manufacturers, or test reports.
- 4.34.8 For each of the data items listed below that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data can include a copy of the information provided by the supplier or manufacturer of the example coating or material or a summary of the results of testing conducted according to Permit Conditions 4.12, 4.13, or 4.15. You do not need to submit copies of any test reports.
- Mass fraction of organic HAP for one coating, for one thinner, and for one cleaning material.
  - Volume fraction of coating solids for one coating.
  - Density for one coating, one thinner, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.
  - The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of Permit Condition 4.18.
- 4.34.9 The calculation of pounds organic HAP emitted per liter coating solids used (lb organic HAP emitted per gallon coating solids used) for the compliance option(s) you used, as specified in the following:
- For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of Permit Condition 4.14
  - For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate, using Equations 1 and 1A through 1C, 2, and 3, respectively, of Permit Conditions 4.18 through 4.18.3
- 4.35 For each compliance period following the initial reporting period, each semiannual compliance period shall cover from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- 4.36 The first semiannual compliance report shall cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in Permit Condition 4.35 and ends on June 30 or December 31, whichever occurs first date following the end of the initial compliance period.
- 4.37 Each subsequent semiannual compliance report shall cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- 4.38 Each semiannual compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

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4.39 The permittee shall report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If the permittee submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to DEQ.

4.40 The semiannual compliance report shall include the following information:

- Company name and address.
- Name and title of the permittee's responsible official.
- A certified statement by the responsible official that the information supplied is true accurate and complete.
- Date of the report and beginning and ending dates of the reporting period. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- Identification of the compliance option or options that the permittee used on each coating operation in the affected source during the initial compliance period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and end dates the permittee used each option.
- The permittee shall include the calculation results for reach rolling 12-month organic HAP emission rate during the 6-month reporting period.

**4.41 Deviation**

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- Fails to meet any requirement or obligation established by this permit including, but not limited to any emission limit, or operating limit, or work practice standard;
- Fails to meet any term or permit condition that is adopted to implement an applicable requirement in this permit and that is included in the operating permit for any affected source required to obtain such a permit; or
- Fails to meet any emission limit, or operating limit, or work practice standard in this permit during startup, shutdown, or maintenance, regardless of whether or not such failure is permitted.

**4.42 No deviations: Emission Rate Without Add-On Controls Option**

If there were no deviations from the emission limitations in Permit Condition 4.5, the semiannual compliance report shall include a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Permit Condition 4.5, determined according to Permit Conditions 4.17 through 4.22.

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#### **4.43 Deviations: Emission Rate without Add-On Controls Option.**

If there was a deviation from the applicable emission limit in Permit Condition 4.5, the semiannual compliance report shall contain the information listed below:

- The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in Permit Condition 4.5.
- The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee shall provide the calculations for equations 1, 1A through 1C of Permit Condition 4.18; equation 2 of Permit Condition 4.20; and equation 3 of Permit Condition 4.21; and if applicable, the calculations used to determine mass of organic HAP in waste material according to Permit Condition 4.19.
- A statement of the cause of each deviation.

#### **4.44 No deviations: Compliant Material Option**

If there were no deviations from the emission limitations in Permit Condition 4.5, the semiannual compliance report shall include a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coating for which the organic HAP content exceeded the applicable emission limit in Permit Condition 4.5, and you used no thinner or cleaning material that contained organic HAP, determined according to Permit Condition 4.12 .

#### **4.45 Deviations: Compliant Material Option**

If there was a deviation from the applicable emission limit in Permit Condition 4.5, the semiannual compliance report shall contain the following information:

- Identification of each coating used that deviated from the emission limit, each thinner and cleaning material used that contained organic HAP, and the dates and time periods each was used.
- The calculation of the organic HAP content (using Equation 2 of Permit Condition 4.14) for each coating identified in this permit condition. The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).
- The determination of mass fraction of organic HAP for each coating, thinner, and cleaning material identified in this permit condition. You do not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).
- A statement of the cause of each deviation.

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**5. PRINTING****5.1 Process Description**

This emission unit consists of the printing operations at the Fruitland facility. Printing consists of product rotogravure printing of substrate which is applied to products manufactured at facility.

**5.2 Process Description**

VOC and HAP emissions from the printing process are uncontrolled.

***Emissions Limits*****5.3 VOC Emission Limits**

Facility-wide VOC emissions shall not exceed 813.6 tons per year.

**5.4 HAP Emission Limits**

- Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.
- Facility-wide acetaldehyde emissions shall be less than 0.148 lbs/hr.
- Facility-wide formaldehyde emissions shall be less than 0.048 lbs/hr.

**[PTC Condition]**

5.5 Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit emissions to no more than 5% of the organic HAP applied for the month; or to no more than 4% of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20% of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in Permit Conditions 5.6 through 5.22:

5.6 The permittee shall demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with 40 CFR 63.827(b)(2).

5.7 The permittee shall demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with Permit Conditions 5.8 through 5.9. The permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows:



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- 5.8 The permittee shall determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2).
- 5.9 Calculate the monthly average as-applied organic HAP content,  $C_{ahi}$  of each ink, coating, varnish, adhesive, primer, and other solids-containing material using the following equation:

$$C_{ahi} = \frac{\left( C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij} \right)}{M_i + \sum_{j=1}^q M_{ij}}$$

Where:

- $C_{ahi}$  = the monthly average, as-applied, organic HAP content of solids-containing material, i, expressed as a weight-fraction, lb/lb
- $C_{hi}$  = the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, lb/lb
- $C_{hij}$  = the organic HAP content of solvent j, added to solids-containing material i, expressed as a weight-fraction, lb/lb
- $M_i$  = the mass of ink or other material, i, applied in a month, lb
- $M_{ij}$  = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing material, i, in a month, lb

- 5.10 The permittee shall demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied, either:
- 5.11 Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or
- 5.12 Contains no more than 0.20 lb of organic HAP per lb of solids applied, on a monthly average as-applied basis
- 5.13 The permittee may demonstrate compliance with Permit Conditions 5.10 through 5.12 in accordance with Permit Conditions 5.14 through 5.16.
- 5.14 The permittee shall use the procedures of Permit Condition 5.7 to determine which materials meet the requirements of Permit Condition 5.10 through 5.12.
- 5.15 The permittee shall determine the as-applied solids content following the procedure in 40 CFR 63.827(c)(2) of all materials which do not meet the requirements of Permit Condition 5.11. The permittee may calculate the monthly average as-applied solids content of materials which are reduced, thinned, or diluted prior to application, using following equation:

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$$C_{asi} = \frac{C_{si}M_i}{M_i + \sum_{j=1}^q M_{ij}}$$

Where:

- $C_{asi}$  = the monthly average, as applied, solids content, of solids-containing material, i, expressed as a weight-fraction, lb/lb
- $C_{si}$  = the solids content of ink or other material, i, expressed as a weight-fraction, lb/lb
- $M_i$  = the mass of ink or other material, i, applied in a month, lb
- $M_{ij}$  = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing material, i, in a month, lb
- $M_j$  = the mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, applied in a month, lb

- 5.16 Calculate the as-applied organic HAP to solids ratio,  $H_{si}$ , for all materials which do not meet the requirements of Permit Condition 5.11, using following equation:

$$H_{si} = \frac{C_{ahi}}{C_{asi}}$$

Where:

- $C_{asi}$  = the monthly average, as applied, solids content, of solids-containing material, i, expressed as a weight-fraction, lb/lb
- $C_{ahi}$  = the monthly average, as-applied, organic HAP content of solids-containing material, i, expressed as a weight-fraction, lb/lb

- 5.17 The permittee shall demonstrate that the monthly average as-applied organic HAP content,  $H_L$ , of all materials applied is less than 0.04 lb HAP per lb of material applied, as determined by following equation:

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j}$$

Where:

- $C_{hj}$  = the organic HAP content of solvent j, expressed as a weight-fraction, lb/lb
- $C_{hi}$  = the organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, lb/lb

- 5.18 The permittee shall demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied,  $H_s$ , is less than 0.20 lb HAP per lb solids applied as determined by following equation:

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$$H_s = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i C_{si}}$$

- 5.19 The permittee shall demonstrate that the total monthly organic HAP applied, H, as determined by following equation, is less than the calculated equivalent allowable organic HAP, H<sub>a</sub>, as determined by 40 CFR 63.825(e) of this section

$$H = \sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}$$

### ***Operating Requirements***

#### **5.20 Purchase Records**

The permittee shall maintain the purchase records of all manufacturing-related materials that contain HAPs, and VOCs including but not limited to, adhesives, caulks, degreasers, solvents, and paints. The purchase records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

#### **5.21 Material Safety Data Sheets**

The permittee shall maintain the MSDS' for the manufacturing-related materials that contain HAPs and VOCs purchased pursuant to Permit Condition 5.20.

- 5.22 The facility waste stream shall be analyzed using an approved analytical method. The analysis must clearly indicate the volume of the waste stream (gallons), and the VOC and HAP content (lb/gal) of the waste stream.

**[PTC Condition]**

### ***Monitoring and Recordkeeping Requirements***

#### **5.23 Material Usage Records**

- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains HAPs. The usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.
- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains VOCs. The usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request

- 5.24 The permittee shall monitor and record the monthly and annual VOC emissions using the purchase records required by Permit Condition 5.20, the MSDS' required by Permit Condition 5.21, VOC waste stream data required by Permit Condition 5.22 and the material usage records required by Permit Condition 5.23 to demonstrate compliance with Permit Condition 5.3. Annual VOC emissions shall be determined by summing monthly VOC emissions over the previous consecutive 12-month period.

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Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

**[PTC Condition]**

- 5.25 The permittee shall monitor and record the monthly and annual HAP emissions using the purchase records required by Permit Condition 5.20, the MSDS' required by Permit Condition 5.21, HAP waste stream data required by Permit Condition 5.22 and the material usage records required by Permit Condition 5.23 to demonstrate compliance with Permit Condition 5.4. Annual HAP emissions shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

**[PTC Condition]**

- 5.26 Owners or operators of product and packaging rotogravure or wide-web flexographic printing presses shall demonstrate compliance according to the procedures in Permit Condition 5.27 if the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controllable work stations.
- 5.27 The owner or operator of one or more uncontrolled product and packaging rotogravure or wide-web flexographic printing presses shall determine the organic HAP applied on those presses using the equation in Permit Condition 5.19. The organic HAP emitted from an uncontrolled press is equal to the organic HAP applied on that press.
- 5.28 If demonstrating compliance on the basis of organic HAP emission rate based on solids applied or emission of less than the calculated allowable organic HAP, the permittee shall determine the solids content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2).
- 5.29 The permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according Permit Condition 5.27. The affected source is in compliance for the month, if:
- 5.30 The total mass of organic HAP emitted by the affected source was not more than 4% of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied by the affected source, or
- 5.31 The total mass of organic HAP emitted by the affected source was not more than 20% of the total mass of solids applied by the affected source, or
- 5.32 The total mass of organic HAP emitted by the affected source was not more than the equivalent allowable organic HAP emissions for the affected source,  $H_a$ , calculated in accordance with 40 CFR 63.825(e), or
- 5.33 The total mass of organic HAP emitted by the affected source was not more than 5% of the total mass of organic HAP applied by the affected source. The total mass of organic HAP applied by the affected source in the month shall be determined by the permittee using the equation in Permit Condition 5.18.
- 5.34 The permittee shall comply with the compliance dates of the following:

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- 5.35 The compliance date for an owner or operator of an existing affected source subject to the provisions of this subpart is May 30, 1999.
- 5.36 The compliance date for an owner or operator of a new affected source subject to the provisions of this subpart is immediately upon start-up of the affected source, or May 30, 1996, whichever is later.
- 5.37 Affected sources which have undergone reconstruction are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment are not considered in determining whether the affected source has been reconstructed. Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs.

***Performance Test Methods***

- 5.38 Determination of the organic HAP content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials for the purpose of meeting the requirements of 40 CFR 63.825 shall be conducted according to Permit Condition 5.39.
- 5.39 Each owner or operator of a product and packaging rotogravure or wide-web flexographic printing facility shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following one of the procedures Permit Condition 5.40 through 5.44:
- 5.40 The permittee may test the material in accordance with Method 311 of Appendix A of this Part 63. The Method 311 determination may be performed by the manufacturer of the material, and the results provided to the permittee. If these values cannot be determined using Method 311, the permittee shall submit an alternative technique for determining their values for approval by the Administrator. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.
- 5.41 The permittee may determine the volatile matter content of the material in accordance with 40 CFR 63.827(c)(2) and use this value for the organic HAP content for all compliance purposes.
- 5.42 The permittee may, except as noted in Permit Condition 5.45, rely on formulation data provided by the manufacturer of the material on a CPDS if:
- 5.43 The manufacturer has included in the organic HAP content determination, all organic HAP present at a level greater than 0.1% in any raw material used, weighted by the mass fraction of each raw material used in the material, and
- 5.44 The manufacturer has determined the organic HAP content of each raw material present in the formulation by Method 311 of Appendix A of 40 CFR Part 63, or, by an alternate method approved by the Administrator, or, by reliance on a CPDS from a raw material supplier prepared in accordance with 40 CFR 63.827(b)(2)(iii)(A).

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- 5.45 In the event of any inconsistency between the Method 311 of Appendix A of this part 63 test data and a facility's formulation data, that is, if the Method 311 test value is higher; the Method 311 test data shall govern, unless after consultation, a permittee demonstrates to the satisfaction of the enforcement authority that the formulation data are correct.

***Recordkeeping***

- 5.46 The recordkeeping provisions of 40 CFR Part 63, Subpart A, of this part that apply and those that do not apply to owners and operators of affected sources subject to Subpart KK are listed in Table 1 of this subpart.
- 5.47 5.47 The permittee shall comply with the monthly recordkeeping requirements of 40 CFR 63.628(b)(1). Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.
- 5.48 The permittee shall comply with the liquid-liquid material balance recordkeeping requirements of 40 CFR 63.828(c). Each owner or operator of an affected source subject to this subpart shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.824-63.824. The records shall be maintained in accordance with the requirements of 40 CFR 63.10(b).

***Reporting***

- 5.49 The permittee shall comply with the reporting provisions of 40 CFR 63.830(a).
- 5.50 The permittee shall submit the reports required by 40 CFR 63.830(b)(1) through (6).

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**6. PERMIT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
  - A notification of the date of initiation of construction, within five working days after occurrence;
  - A notification of the date of completion/cessation of construction, within five working days after occurrence;
  - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
  - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
  - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.